

**RESPONSES TO DOE COMMENTS  
ON THE OU 2 WORK PACKAGES DATED JUNE 25, 1993**

**GENERAL COMMENTS**

1. The external milestones for submittal to EPA/CDH need to be preceded by an external milestone for submittal to DOE, at least one week prior to the date due to EPA/CDH. This is necessary for DOE/RFO to prepare transmittal correspondence and get signatures.

RESPONSE: Certain milestones were compressed to meet the shortest schedule and this may not be achievable. If any schedule relief is granted, this additional milestone one week in advance of delivery to EPA/CDH will be added into the new schedules.

2. Operable Unit 1 has a work package for an Environmental Assessment in conjunction with the CMS/FS. When will this work package be prepared for OU 2?

RESPONSE: The work package is scheduled to be prepared for FY95.

**WP 12050 O&M**

1. This draft does not cover the attempt to discontinue the collection of water from the three (or at least two) sources (SW-59, 61, and 132). Although planning for full operation is necessary, reduced operations should be mentioned.

RESPONSE: The possibility of reduced operations is now a planning assumption.

2. It should be noted in the narrative that even though operations of the treatment may be reduced from 24 hour operations, collection of water must continue for 24 hours a day.

RESPONSE: Collection of water 24 hours a day is now a planning assumption.

3. There needs to be a link between the Walnut Creek IM/IRA and the Subsurface IM/IRA as the Subsurface will be using the Walnut Creek System when vapor extraction begins in September 1993.

RESPONSE: There are no schedule links between the two work packages, i.e. there are no precursor or successor activities. Therefore, there is no interface at the work package level even though this work package supports tasks in Work Package (WP) 12055.

4. Analytical sampling can be reduced because the treatability studies are written. Although it is important to know influent, we are only required to sample the effluent (twice a week).

RESPONSE: A proposal for reducing analytical sampling has been written. For planning purposes, the current frequency of analytical sampling must be used until approval for reduced sampling is received. At that time, the work package will be modified.

5. What is activity 12050-400, Surface Water Interim Action Report (by Oct. 31, 1993)?

RESPONSE: This task provides funding for any follow-on work or documentation that may be required after submittal of the Final Report.

6. Basis of Estimate for activity number 12050-100, preparation of quarterly reports. The narrative states that "DOE has requested additional information..." Clarify that the reports should not just present raw data, but do some review and interpretation of the data. This should be less involved because of the reduced analytical samples (since the treatability studies should be done), and there will be less data to review. We need to discuss scope and content of these quarterly reports.

RESPONSE: Discussions will be held with DOE counterpart to determine scope and content of quarterly reports.

7. Basis of Estimate for activity number 12050-300, analytical sampling: "sampling events taken in FY94 will be identical to the FY93 sampling..." This is not required because sampling in FY93 for data in for the treatability studies, that will be completed. Reduced sampling is appropriate. The only required sampling is twice a week at the effluent. However, it makes sense to continue sampling at the effluent and do some sampling at some locations. Also, it may be appropriate to do screening level sampling rather than the expensive full-suite of samples.

RESPONSE: Analytical sampling will be reduced after approval has been received. The proposed changes to do screening rather than full suite analyses, and to continue effluent sampling and some location sampling will be considered. The work package will be modified after discussions are held and approval received.

8. Basis of Estimate for activity number 12050-400: the report is due September 8, not October. However, there may be some follow-on work/documentation necessary to document discontinuation of collection of water, such as an Explanation of Significant Differences.

RESPONSE: Follow-on work may be required as well as additional documentation to support this task. Report deliverable is due September 8, 1993; task completion including follow-on work is estimated for October 31, 1993.

9. Section 4.8, milestones are missing.

RESPONSE: These four milestones for the quarterly reports were added.

## WP 12052 IRA PLAN

1. There are four work packages for the Subsurface IM/IRA. It is unclear in the scope summary section, the purpose of this work package.

RESPONSE: Scope summaries have been clarified defining the tasks to be accomplished by this work package.

2. An important omission in the Subsurface IM/IRA documentation to date, is our commitment for post-pilot operation. Post-pilot operations may be necessary based upon the results of testing at a specific test site (Section 5.2 of the IM/IRA). Although not discussed in any detail, the expectation of the IM/IRA was that if significant removal of taking place at the end of the test, we would be expected to continue in a "post-pilot" phase. The work packages for the Subsurface IM/IRA need to consider and plan for this possibility for FY94 and outward.

RESPONSE: Post-pilot operations have been added into WP 12055, Testing and Operations. A duration of six weeks has been assumed.

3. As a "placeholder", there should be some level of funding for 3D modeling of pilot tests using Dynamic Graphics software. Figures are to be included in the Pilot testing reports to reflect area of influence. Based on work to date, this is not a major time or cost, if done in-house. Also, public/oversight committee (Rocky Flats Cleanup Commission) comments on using more 3D modeling can be used as a driver.

RESPONSE: A placeholder has been added to the support work package to allow for 3 D graphics in any of the OU 2 work packages.

4. There is the statement "no interfaces with other W.P.s". What about the use of the Surface Water IM/IRA treatment facilities?

RESPONSE: There are no schedule links between the two work packages, i.e. there are no precursor or successor activities. Therefore, there is no interface at the work package level even though WP 12055 is supported by WP 12050.

5. Section 4.8, milestone is incomplete.

RESPONSE: Section 4.8 has been completed and included.

## WP 12053 CONSTRUCTION

1. A technical assumption is that test 3 will be in the Mound area (we just told EPA/CDH that there was insufficient contamination to do testing the Mound area). If the steam stripping occurs, it was planned for the 903 Pad area. The planning should incorporate the requirements to test in the 903 Pad area because of the inherent greater costs of working in a rad-controlled area.

RESPONSE: The assumption for the location for test site 3 has been changed to the 903 Pad.

2. There is the statement "no interfaces with other W.P.s". What about the use of the Surface Water IM/IRA treatment facilities?

RESPONSE: There are no schedule links between the two work packages, i.e. there are no precursor or successor activities. Therefore, there is no interface at the work package level even though WP 12055 is supported by WP 12050.

3. There is the statement "no interfaces with other W.P.s". The agreed approach for implementation of steam stripping was successful bench scale testing, funded by EM-50. Additionally, we need to specify co-funding from EM-50 for pilot scale testing... UNLESS WE WANT TO DO IT WITHOUT EM-50 due to the administrative requirements of EM-50.

RESPONSE: This is a funding decision not controlled by EG&G. The work package reflects the funding required to complete the scope if no external funding is obtained. If funding is acquired, the work package dollar amount will be decreased.

4. Section 4.8, milestone is missing.

RESPONSE: Section 4.8 has been completed and included in the work package.

#### WP 12054 DESIGN

1. There is no scope summary, planning assumptions in this version (Sections 4.1.1 and 4.1.2), so I cannot comment on scope or planning assumptions.

RESPONSE: Scope summary and planning assumptions have been included.

2. Basis of estimate for test site #2 needs to consider the bullets under comments of WP 12053.

RESPONSE: Response is the same as given for WP 12053.

3. Section 4.8, milestone is missing.

RESPONSE: Section 4.8 has been completed and included in the work package.

4. A technical assumption is that test 3 will be in the Mound area. If the steam stripping occurs, it was planned for the 903 Pad area. The planning should incorporate the requirements to test in the 903 Pad area because of the inherent greater costs of working in a rad-controlled area.

RESPONSE: The assumption for the location for test site 3 has been changed to the 903 Pad.

#### WP 12055 TESTING AND OPERATIONS

1. There is no scope summary, planning assumptions in this version (Sections 4.1.1 and 4.1.2), so I cannot comment on scope or planning assumptions.

RESPONSE: Scope summary and planning assumptions have been included in the work package.

2. Basis of estimate for test site #2 needs to consider the bullets under comments of WP #12053.

RESPONSE: Response is the same as given for WP 12053.

3. An important omission in the Subsurface IM/IRA documentation to date is our commitment for post-pilot operation. Post-pilot operations may be necessary based upon the results of testing at a specific test site (Section 5.2 of the IM/IRA). Although not discussed in any detail, the expectation of the IM/IRA was that if significant removal of taking place at the end of the test, we would be expected to continue in a "post-pilot" phase. The work packages for the Subsurface IM/IRA need to consider and plan for this possibility for FY94 and onward.

RESPONSE: Post pilot test operations beyond the six weeks already scoped for sustained operations will be considered as an out year assumption.

4. The Section 4.8 milestones do not reflect the external milestones shown in the detailed schedule.

RESPONSE: Section 4.8 has been included in the work package.

#### WP 12057 REMEDIAL INVESTIGATIONS

1. It may be overly optimistic to assume that: 1) that an OU-specific be allowed by EPA/CDH; and 2) the RFI/RI report will require only minor corrections.

RESPONSE: Planning assumptions have been changed to reflect the current status of the HHRA and to allow up to 3,000 hours of subcontract labor to revise the RFI/RI report.

2. For planning purposes, I don't think we can assume one OU-wide risk assessment, but also not the four risk assessments agreed for OU 1. To make sure we have sufficient funding, it would be prudent to plan for up to four or plan for time and expenses for dispute resolution. Based on the OU 1 experience and the current "runaround" from OU 2. Memo to Benedetti this week says: "Your proposed "Option 1" puts us at risk of the Draft RFI/RI Report being found unacceptable by EPA/CDH which could extend the period of time we are subject to stipulated penalties. This approach is unacceptable without first obtaining resolution with EPA and CDH on the approach for the risk assessment. There, we must first meet with EPA/CDH on an acceptable approach, then you must be prepared to support dispute resolution under the IAG.

RESPONSE: The HHRA will be mostly completed by FY 1994 unless a significantly greater scope than what is currently planned is agreed upon. In that case, all schedule and cost estimates will be revised, and the entire work package will need to be revised. The

assumption has been changed to reflect this position. Dispute resolution cannot be planned under this work package. If needed, the work package must be revised at that time.

3. The RFI/RI report will likely require more than "minor" corrections, based upon the "expedited" timeframe to complete the draft, and the experience on OU 1. OU 1 is a "simple" OU relative to OU 2.

RESPONSE: Planning assumptions have been changed to allow up to 3,000 hours of subcontract labor to revise the RFI/RI report.

4. The Phase II RFI/RI report is supposed to contain all historical data, including that from Phase I. I did not see this in the assumptions.

RESPONSE: This assumption has been added.

5. External milestones should include the draft and final risk assessment Technical Memorandums.

RESPONSE: No technical Memoranda are scheduled for delivery in FY 94.

6. As a "placeholder", there should be some level of funding for 3D modeling of the pilot tests using Dynamic Graphics software. Figures are to be included in the pilot testing reports to reflect area of influence. Based on work to date, this is not a major time or cost, if done in-house. Also, public/oversight committee (Rocky Flats Cleanup Commission) comments on using more 3D modeling can be used as a driver.

RESPONSE: A placeholder has been added to the support work package to allow for 3 D graphics in any of the OU 2 work packages.

#### WP 12058 TREATABILITY/FEASIBILITY STUDY

1. Section 4.1.2: Although there is nothing in writing, we have verbal information that EM-40 may specify that for each OU, an innovative technology is to be considered as part of the feasibility study process. We should assume that this will be the case.

RESPONSE: The planning assumption is that no innovative technologies are required now. If innovative technologies are required in the future, the work package will be revised to reflect this requirement.

2. The external milestone section includes submittal for the treatability work plan to EPA/CDH but this is not explained in the scope summary and assumptions. Although the "IAG Task Requirements/Duration flow chart does not include EPA/CDH input into the treatability studies of the FS, it is hard to believe that we will be able to spend the 26 months (3 months in the IAG) between the submittal of the Final RFI/RI Report and the Draft CMS/FS report without some agency coordination of OU activities. Rationale should be expanded.

RESPONSE: Submittal of the treatability work plan will be added to the scope summary and assumptions. Agency coordination will occur within the 26 months between the Final RFI/RI Report and the Draft CMS/FS Report but primarily on an informal basis. TMs will be provided as shown in section 4.4 Deliverables/ Criteria.

3. It is unclear why we should not be able to start the Treatability Study Work Plan prior to FY94 rather than FY95.

RESPONSE: The Treatability Study work plan has been accelerated and will begin in FY94.

4. It appear that only one treatability test will be performed. It would appear that due to the complexity of OU 2, that more than one study would be necessary.

RESPONSE: Three treatability studies were planned. The scope has been revised to reflect this fact.

#### WP 12065 PROJECT SUPPORT

1. An important omission in the OU planning is for the Subsurface IM/IRA documentation. We may need to implement our commitment for post-pilot operation. Post-pilot operations may be necessary based upon the results of testing at a specific test site (Section 5.2 of the IM/IRA). Although not discussed in any detail, the expectation of the IM/IRA was that if significant removal of taking place at the end of the test, we would be expected to continue in a "post-pilot" phase. The work packages need to consider and plan for this possibility for FY94 and outward.

RESPONSE: Post pilot test operations will be considered as an out year assumption in WP 12055 Testing and Operations.

2. The assumption that one seminar will be the extent of training implies that your staff knows it all. I don't think that is the case. Additional training should be planned.

RESPONSE: One seminar per person is a standard for most areas but we agree, additional training is always useful and this task has been increased to two seminars per year per staff member. In addition, company sponsored training is funded and encouraged.

3. Is this the appropriate WP for funding for payment of stipulated penalties for the Draft RFI/RI report missed milestone. Nine months delay could result in stipulated penalties up to \$355,000.

RESPONSE: Stipulated fines and penalties cannot be funded under a work package.

4. There is not mention of upgrading posting and access control of the plutonium/ americium contaminated areas. This is still an outstanding Tiger Team finding.

RESPONSE: Posting the Americium Zone will be accomplished in FY 93 as a result of additional funding obtained from change control to accomplish this task.